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11 Jonathan Lam

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14 **INTUITIVE SURGICAL**  
15 **OPERATIONS, INC.,**

16 Plaintiff,

17 vs.

18 **JONATHAN LAM,**

19 Defendant.

Case No. 3:24-cv-7427

Case Assigned to:  
Hon. James Donato

**JOINT STIPULATION RE TRO  
HEARING**

1 Plaintiff INTUITIVE SURGICAL OPERATIONS, INC. (“Plaintiff”) and De-  
 2 fendant JONATHAN LAM (“Defendant”), by and through their counsel,  
 3 hereby stipulate and agree as follows:

- 4 1. WHEREAS, Plaintiff filed the Complaint in this matter on October 24,  
 5 2024;
- 6 2. WHEREAS, Plaintiff filed a Motion for a Temporary Restraining Order  
 7 and Expedited Discovery (the “TRO Motion”) on October 25, 2024,  
 8 and noticed such motion for hearing on October 28, 2024. The hear-  
 9 ing was re-set for November 7, 2024 following reassignment of this  
 10 matter to this Court;
- 11 3. WHEREAS, Counsel for Defendant is unavailable on November 7; and
- 12 4. WHEREAS, the Parties have met and conferred and wish to continue  
 13 to TRO hearing, and have been advised by Court staff that December 5,  
 14 2024 is desirable for the Court;

15  
 16 THEREFORE, the Parties stipulate and agree as follows:

- 17 1. Hearing on Plaintiff’s Temporary Restraining Order shall be continued  
 18 to December 5, 2024;
- 19 2. Defendant’s response to Plaintiff’s Motion for a Temporary Restraining  
 20 Order shall be due at 9:00 a.m. on December 2, 2024; and
- 21 3. Mr. Lam agrees that until such time as an Order issued on Plaintiff’s  
 22 TRO Motion, neither he nor any of his agents, accomplices, aiders and  
 23 abettors, co-conspirators, or others working in concert with him,  
 24 whether directly or indirectly, shall solicit, access, review, use, disclose,  
 25 leverage, and/or interact in any manner with any Intuitive property,  
 26 any non-public Intuitive information, and/or any communication, doc-  
 27 ument, work product, derivative work, or other material containing,  
 28

1 reflecting, or comprising non-public Intuitive information, except that  
2 Mr. Lam's counsel of record shall be permitted to access, review, and  
3 use such information solely in defending the above-captioned litigation  
4 between Mr. Lam and Intuitive.  
5  
6

7 Dated: November 5, 2024

**KING & SIEGEL LLP**

9 By: /s/ Robert J. King

10 Robert J. King

11 Julian King

12 Attorneys for Defendant  
13

14 Dated: November 5, 2024

**BRAUNHAGEY & BORDEN LLP**

16 By: /s/ Doug Tilley

17 Doug Tilley

18 Attorneys for Plaintiff  
19

20 PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.  
21

22 Dated: \_\_\_\_\_

23 HON. JAMES DONATO

24 UNITED STATES DISTRICT JUDGE  
25  
26  
27  
28